

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

JOHN HANCOCK LIFE INSURANCE
COMPANY, JOHN HANCOCK
VARIABLE LIFE INSURANCE
COMPANY, and MANULIFE
INSURANCE COMPANY,

Plaintiffs,

v.

ABBOTT LABORATORIES,

Defendant.

CIVIL ACTION NO. 05-11150-DPW

**STIPULATION AND [PROPOSED] ORDER EXTENDING TIME
TO SUBMIT DISPUTES UNDER STIPULATED PROTECTIVE ORDER**

1. On July 15, 2005, the Court entered a Stipulated Protective Order governing the exchange, disclosure, and use of certain confidential, trade secret, or proprietary information. The Stipulated Protective Order establishes certain deadlines for the submission of disputes to the Court in the event the parties are not able to resolve their disputes by agreement.

2. Paragraph 21 of the Stipulated Protective Order establishes a seven-day deadline for the party objecting to a confidentiality designation to move the Court to remove or change the designation. Paragraph 14 of the Stipulated Protective Order establishes a seven-day deadline for a party objecting to the proposed disclosure of materials designated as Highly Confidential materials to certain individuals to move the Court to prohibit the proposed disclosure.

3. Plaintiffs have objected to defendant's designation of certain documents as Highly

Confidential under the Stipulated Protective Order. In addition, defendant has objected to plaintiffs' proposed disclosure of materials designated as Highly Confidential to certain outside consultants.

4. Counsel for the parties have had "meet and confer" conferences, and are continuing to attempt to resolve their disputes relating to the issues identified above. To permit further attempts to resolve their disputes without Court involvement, the parties have agreed and propose, with the Court's approval, to extend the deadlines for submission of their disputes to the Court by 14 days, through and including February 16, 2006.

5. The parties' proposed extension of the deadlines under the Stipulated Protective Order will not affect any Court scheduled dates.

IT IS HEREBY STIPULATED, subject to the approval of the Court, that the deadlines under Paragraphs 21 and 14 of the Stipulated Protective Order for the submission of the disputes identified herein to the Court shall be extended by 14 days, through and including February 16, 2006.

ABBOTT LABORATORIES

By its attorneys,

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JOHN HANCOCK LIFE INSURANCE
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Dated: February 1, 2006

IT IS SO ORDERED:

Dated: February 17, 2006



Hon. Douglas P. Woodlock
United States District Judge